



Clean Harbors of Wichita
2549 North New York Street
Wichita, KS 67219

October 29, 2012

Mike Martin
USEPA Region VII
Environmental Services Division
300 Minnesota Avenue
Kansas City, KS 66101

RE: Notice of Non-Compliance dated 10-18-12

Via: Fedex

Dear Mr. Martin,

This submittal will serve as Clean Harbors' written response to the alleged violations noted during the 10/18/12 inspection of the Clean Harbors Wichita Facility.

Alleged Violation # 1

Notification not accurate (Brian Key is no longer the site contact)

Kent Frame has only recently taken over As GM at Wichita in September. Because the Part B permit is currently being renewed, we were in discussion with KDHE early that week to discuss the timing of this update by replacing Brian Key with Kent, once the renewal had been completed. We respectfully request this alleged violation be rescinded.

The updated permit information is attached. (See attachment # 1)

Alleged Violation # 2

Hazardous Waste Determination not conducted in Building D

The chemicals in containers were inspected by Clean Harbors personnel and verified to still be viable products. As these chemicals were still being held for use with their intended purpose, it was premature to perform a waste determination.

The containers of fluorescent lamps were found to be universal waste and are being disposed as such.

The material spilled on the cabinet was identified by onsite personnel as a waste pesticide that should carry a U240 for 2, 4-D. The MSDS is attachment # 2.

Alleged Violation # 3

RCRA



551084



Clean Harbors of Wichita
2549 North New York Street
Wichita, KS 67219

The accumulation Start date not marked on two storage containers of spent PPE located in Building C

The labels have been updated (see attachment # 3 for photos of the updated labels).

Alleged Violation # 4

Fire Protection equipment (fire extinguishers) not tested and maintained to ensure proper operation

The fire extinguishers are inspected weekly. This inspection is documented on the Site Safety and Security Inspection Form. I have attached the form from the week in question as Attachment # 4. Going forward we will document that inspection at least monthly on the tag attached to the fire extinguisher. We respectfully request this alleged violation be rescinded.

Alleged Violation # 5

The Contingency Plan not amended (immediately) with the Change to the list of Emergency Coordinator

Kent Frame has only recently taken over As GM at Wichita in September. Because the Part B permit is currently being renewed, we were in discussion with KDHE early that week to discuss the timing of this update by replacing Brian Key with Kent, once the renewal had been completed. We respectfully request this alleged violation be rescinded.

The updated permit information is attached. (See attachment # 1)

Alleged Violation # 6

The Containment area in Building C is not free of cracks and gaps.

This issue had been identified during our permit required facility inspection. It was then assigned in the work ticket system and was in the process of being resolved when the inspection took place. The work ticket is a system by which issues are identified, assigned to appropriate personnel for resolution and resolved. This is all done electronically. We have since completed resealing the cracks. Pictures of the sealed cracks and the work ticket are included in attachment # 5

Alleged Violation # 7

Accumulation precipitation located in building I containment areas not removed

The rainwater in question has been removed. We are also in the process of fixing the roll up door to prevent further rainwater from seeping in.



Clean Harbors of Wichita
2549 North New York Street
Wichita, KS 67219

If, after review of the information presented, you have any questions please feel free to contact me at 513-823-2284 or by email at bleys@cleanharbors.com.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Stephen Bley', with a long, sweeping flourish extending to the right.

Stephen Bley
Facility Compliance Manager

Cc;
File
Kent Frame



Clean Harbors of Wichita
2549 North New York Street
Wichita, KS 67219

Attachment # 1
Updated permit information

Clean Harbors Kansas, LLC
RCRA Permit Application
Section H
Contingency/Emergency Plan

Table H-1

Emergency Response Coordinators

Primary Emergency Response Coordinator

Kent Frame

Work – 316-833-4952

Ex. 6 PII

Alternate Emergency Response Coordinator

John Martin

Work: 316-269-7498

October 17, 2012
Revision No. 1



Clean Harbors of Wichita
2549 North New York Street
Wichita, KS 67219

Attachment # 2
MSDS for Pesticide

Material Safety Data Sheet

Product Name: TRIMEC 992 Broadleaf Herbicide

MSDS No.: 992-6

Version No.: 013

EPA Registration No.: 2217-656

1. Basic Information:

Manufacturer: PBI/Gordon Corporation
Address: 1217 West 12th Street
City, State Zip: Kansas City, MO 64101-1407
Information Contact: Environmental, Health, & Safety Dept.
Information Telephone Number: (816)421-4070
Emergency Contact: Chemtrec
Emergency Telephone Number: (800)424-9300

Last Update: 9/9/2003

Chemical State: ☒ Liquid ☐ Gas ☐ Solid
Chemical Type: ☐ Pure ☒ Mixture



2	Health
1	Flammability
0	Reactivity
B	Pers. Protection

2. Ingredients:

☐ Trade Secret (ND = Not Disclosed)

CAS No.	Chemical Name	% Range	EHS		IARC		SARA 313		OSHA PEL	ACGIH TLV	Other Limits
			NTP		SUB Z						
2008391	Dimethylamine Salt of 2,4-dichlorophenoxyacetic acid (2,4-D)	30.56%	N	N	Y	N	N	NI		NI	NI
2300665	Dimethylamine Salt of 3,6-dichloro-o-anisic acid (Dicamba)	2.77%	N	N	N	N	Y	NI		NI	NI
66423094	Dimethylamine Salt of R(+)-2-(2-Methyl-4-chlorophenoxy) propionic acid (MCPP)	8.17%	N	N	Y	N	N	NI		NI	NI

3. Hazardous Identification:

Hazard Category:

☒ Acute ☒ Chronic ☐ Fire ☐ Pressure ☐ Reactive

Hazardous Identification Information:

The International Agency for Research on Cancer (IARC) lists chlorophenoxy herbicides in its Group 2B (limited evidence for carcinogenicity in humans.) The US EPA has given the chlorophenoxy herbicides 2,4-D, 2,4-DP, MCPP, and MCPA a Class D classification (not classifiable as to human carcinogenicity.) More current 2,4-D lifetime feeding studies in rats and mice did not show carcinogenic effects and a recent World Health Organization (WHO) review of 2,4-D toxicology has concluded that 2,4-D is not a carcinogen.

4. First Aid Measures:

Route(s) of Entry:

Skin contact, Inhalation, Ingestion.

Health Hazards (Acute and Chronic):

EYES: Contact may cause irritation and burning.

SKIN: Moderately irritating to the skin; may be absorbed through the skin.

INHALATION: Moderately irritating to the mucous membranes. Inhalation of sprays may cause burning sensations in the respiratory tract, resulting in coughing.

INGESTION: May irritate the gastrointestinal tract.

Signs and Symptoms:

Inhalation may cause burning in the chest, with coughing. Prolonged inhalation sometimes causes dizziness. Ingestion usually leads to vomiting. Pain in the chest and abdomen, and diarrhea may follow.

Medical Conditions Generally Aggravated by Exposure:

Individuals with chronic skin disease or known sensitivity to

First Aid Measures (Continued)

chlorophenoxy compounds should either avoid using them or take strict precautions to avoid contact. (respirator, gloves, etc.)

Emergency First Aid Procedure:

If in eyes:

- Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.
- Call a poison control center or doctor for treatment advice.

If on skin:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15 - 20 minutes.
- Call a poison control center or doctor for treatment advice.

If swallowed:

- Call a poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to do so by the poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

If inhaled:

- Move person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.
- Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-877-800-5556 for emergency medical treatment advice.

Other Health Warnings:

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

Material Safety Data Sheet

Product Name: TRIMEC 992 Broadleaf Herbicide

MSDS No.: 992-6

Version No.: 013

EPA Registration No.: 2217-656

5. Fire Fighting Measures:

Flash Point: 129°F F.P. Method: Closed Cup

Lower Explosive Limit: NI

Upper Explosive Limit: NI

Fire Extinguishing Media:

Foam, CO₂, dry chemical, water. The low flash point of this product is due to a minor component in the mixture. Based on independent laboratory testing of similar products, this product would not sustain combustion as specified in DOT Regulation 49 CFR 173 Appendix H, and, therefore, would not be classified as a combustible liquid.

Special Fire Fighting Procedures:

Wear positive-pressure breathing apparatus and full protective clothing.

Unusual Fire and Explosion:

This product does not ignite readily, but may burn at a very high temperature. The fire may produce irritating or poisonous gases. Run-off from fire control area or dilution water may cause pollution. If surface water is contaminated, contact local authorities.

6. Accidental Release Measures:

Steps to be Taken in Case Material is Released or Spilled:

See Section 8 for Personal Protective Equipment. Do not touch spilled material. Contain and absorb spilled material on Dri-Rite, sand or other inert absorbent. Collect into drums; cover and label for disposal. Flush area with water if possible.

7. Handling and Storage:

Precautions to be Taken:

Do not contaminate water, food, or feed by storage or disposal. STORAGE: Store in original container in a locked storage area inaccessible to children or pets. Keep from freezing.

Other Precautions:

Engineering Control Statements For WPS Uses:

Containers over 1 gallon and less than 5 gallons: Mixers and loaders who do not use a mechanical system (probe and pump) to transfer the contents of this container must wear coveralls or a chemical-resistant apron in addition to the other required PPE.

Containers of 5 or more gallons: Do not open-pour product from this container. A mechanical system (such as a probe and pump or spigot) must be used for transferring the contents of this container. If the contents of a non-refillable pesticide container are emptied, the probe must be rinsed before removal. If the mechanical system is used in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(d)(4)], the handler PPE requirements may be reduced or modified as specified in the WPS.

When handlers use closed systems or enclosed cabs in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240 (d)(4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

8. Exposure Controls/Personal Protection:

Ventilation Requirements:

Good local ventilation is recommended; mechanical ventilation may be required if exposure limits may be exceeded.

Personal Protective Equipment:

NON-WPS USES:

Applicators and other handlers who handle this pesticide for any use NOT covered by the Worker Protection Standard (40 CFR Part 170) – in general, only agricultural-plant uses are covered by the WPS – must wear the following:

- Wear face shield or goggles when mixing, loading or applying this

Exposure Controls/Personal Protection (Continued)

product. When mixing, loading or applying this product, wear long-sleeved shirt, long pants, socks, shoes, chemical-resistant gloves and eye protection. It is recommended that safety glasses include front, brow, and temple protection.

After using this product, rinse gloves before removing, remove clothing and launder separately before reuse, and promptly and thoroughly wash hands and exposed skin with soap and water. Remove saturated clothing as soon as possible and shower..

PROTECTIVE CLOTHING: Wear long sleeves and pants; chemical-resistant gloves and shoes with socks.

EYE PROTECTION: Safety glasses with side shields or safety goggles.

RESPIRATORY PROTECTION: If exposure limits may be exceeded, wear a respirator with an organic-vapor removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a NIOSH approved respirator with any R, P or HE filter.

9. Physical and Chemical Properties:

Boiling Point: 212°F

Melting Point: NI

Evaporation Rate (Butyl Acetate = 1): <1

Vapor Pressure (mm Hg.): <17 @ 78 F

Vapor Density (Air = 1): >1

Specific Gravity (H₂O = 1): 1.12620

Solubility in Water: Infinite

Appearance and Odor: Brown liquid; amine odor.

Other Information:

pH = 7.5-8.5;

Density = 9.38 pounds/gallon

Freezing point <35°F

10. Stability and Reactivity:

Stability:

Stable.

Incompatibility (Materials to Avoid):

Do not mix with acidic materials, as this will ruin the product.

Decomposition/By-Products:

May produce gases such as HCl, nitrogen oxides, and carbon monoxide when burning.

Hazardous Polymerization:

Will not occur.

11. Toxicological Information:

Acute dermal LD50: >2000 mg/kg.

Acute oral LD50: >1500 mg/kg.

12. Ecological Information:

ENVIRONMENTAL HAZARDS:

This product is toxic to aquatic invertebrates. Drift or runoff may adversely affect aquatic invertebrates and nontarget plants. Do not apply directly to water, or to areas where surface water is present, or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwater. When cleaning equipment, do not pour the washwater on the ground; spray or drain over a large area away from wells and other water sources. Do not apply when weather conditions favor drift from target area. Do not contaminate domestic or irrigation waters.

Most cases of groundwater contamination involving phenoxy herbicides

Material Safety Data Sheet

Product Name: TRIMEC 992 Broadleaf Herbicide

MSDS No.: 992-6

Version No.: 013

EPA Registration No.: 2217-656

Ecological Information (Continued)

such as 2,4-D and MCPP have been associated with mixing, loading and disposal sites. Caution should be exercised when handling 2,4-D and MCPP pesticides at such sites to prevent contamination of groundwater supplies. Use of closed systems for mixing or transferring this pesticide will reduce the probability of spills. Placement of the mixing/loading equipment on an impervious pad to contain spills will help prevent groundwater contamination.

13. Disposal Considerations:

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law and may contaminate groundwater. If these wastes cannot be disposed of by use according to label instructions, contact your state Pesticide or Environmental Control Agency or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: For Metal Containers - Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities. For Plastic Containers - Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or if allowed by state and local authorities by burning. If burned stay out of smoke.

14. Transport Information:

The following guidelines apply for domestic ground transport. If shipping by air or ocean, please contact our Transportation Department.

Freight Class: Herbicides, NOI - NMFC Class #50320

Proper Shipping Name:

For package sizes less than 41.32 gallons: product is non-regulated.

For package sizes 41.32 gallons or greater: Environmentally Hazardous Substances, Liquid, N.O.S., 9, UN3082, PGIII, RQ (2,4-D)

If shipped in bulk containers (greater than 119 gallons), this product is a Marine Pollutant.

When shipped as a Hazardous Material, label required is Class 9 (Miscellaneous). Placards required on bulk shipments only.

15. Regulatory Information:

OSHA STATUS: This product is hazardous under the criteria of the Federal OSHA Hazard Communication Standard 29 CFR 1910.1200.

TSCA STATUS: This product is exempt from TSCA Regulation under FIFRA Section 3(2)(B)(ii) when used as a pesticide.

CERCLA REPORTABLE QUANTITY: 327 pounds of the formulation which contains 100 pounds of Dimethylamine 2,4-D

SARA TITLE III:

SECTION 302 EXTREMELY HAZARDOUS SUBSTANCES: None

SECTION 311/312 HAZARD CATEGORIES: Immediate Health Hazard, Delayed Health Hazard

SECTION 313 TOXIC CHEMICALS: Dimethylamine dicamba CAS# 2300-66-5

RCRA STATUS: When discarded in its purchased form, this product is a listed RCRA hazardous waste and should be managed as a hazardous waste. (40 CFR 261.20-24)

16. Other Information:

REASON FOR ISSUE: To change from racemic MCPP to the plus optical isomer

Other Information (Continued)

Note: NI means Not Indicated.

The information and statements in this Material Safety Data Sheet are believed to accurately reflect the scientific evidence used in making the hazard determination, but is not to be construed as a warranty or representation for which we assume legal responsibility. Additional information may be necessary or desirable depending on particular, exceptional or variable conditions or circumstances of use or storage or because of locally applicable laws or government regulations. Therefore, you should use this information only as a supplement to other information available to you and must make independent determinations of the suitability of the information for your particular circumstances or conditions and of the completeness of the information available from all sources to assure both the proper use of the material described herein and the safety and health of employees.



Clean Harbors of Wichita
2549 North New York Street
Wichita, KS 67219

Attachment # 3
Photo of updated label



Clean Harbors of Wichita
2549 North New York Street
Wichita, KS 67219

Attachment # 4
Site Safety and Security Inspection Form



SAFETY & SECURITY INSPECTION FORM

FormCode

Full Name:	Barry Brown	Date:	10/13/2012		
Location:	Wichita	Military Time:	9:30:00 AM		
Instructions: Note condition of inspection items. If item does not apply to an area, mark N/A. All unsatisfactory findings must be explained below. Include any repairs, changes or other remedial actions required or performed.					
INSPECTION ITEM	YES	NO	N/A	REASON FOR FAILURE	WORK TICKET STAT
Perimeter Fences	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
<input type="text"/>					
Gates	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
<input type="text"/>					
Warning Signs	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
<input type="text"/>					
Exit Signs	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
<input type="text"/>					
Exits / Firelanes / Evacuation Routes Clear?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
<input type="text"/>					
Lighting System	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
<input type="text"/>					
Emergency Lighting System	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
<input type="text"/>					
Accessibility of Safety Equipment/Protective Gear (helmets, faceshields, goggles, boots, gloves, clothing, duct tape, ab. pads)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
<input type="text"/>					
Adequate Supply of Safety Equipment/Protective Gear	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
<input type="text"/>					
Condition of Safety Equipment/Protective Gear	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
<input type="text"/>					

Breathing Apparatus Accessibility	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Breathing Apparatus Adequate Supply/Full Charge	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Breathing Apparatus Condition	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
First Aid Kits	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Blood Borne Pathogen Kits	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Emergency Eyewashes	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Emergency Showers	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Internal/External Communications (Phones/Radios)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Fire Extinguishers	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Absorbent Supply	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Recovery Drum Supply	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Respirators and Cartridges	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Fire Suppression System (monitors, pull stations, alarms) Accessibility	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Fire Suppression System Operable?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		

Water Lines / Hydrants	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Alarm Systems	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Fire Blankets	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Strainers on Fire Suppression System	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Surveillance System/Guard Service	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Supplied Air Delivery System and Reserve	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Wind Sock	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Decontamination Equipment	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Portable Sump Pumps	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Gasoline Pumps	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Loud Speakers	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Chocked Wheels on Parked Vehicles	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Cylinders Secure	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Ventilation Operable	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		

Fall Protection	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Electrical Boxes	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Emergency Contact Info Posted	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Hearing Protection Available	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Housekeeping	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Portable Compressor	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Lime Supply	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
QC Lab Hood	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Rolloff Parking Area	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Dumpster / Outside Containers	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Stormwater Collection System	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Rally Point	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Visitors Log	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Contingency Plan	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		

Wind Instrument	<input checked="checked" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
On-Demand Work Ticket (please describe reason below)					
Select Overall Assessment of Inspection Results	<input type="text" value="Pass"/>				

Submit

Supervisor's Signature _____



Clean Harbors of Wichita
2549 North New York Street
Wichita, KS 67219

Attachment # 5
Resealed cracks

Inspection Work Ticket

Inspection Work Ticket

Work Ticket #: **75313**[Hide History](#)

Location: WH - Clean Harbors Kansas LLC - 2549 North New York Street

Area: Bldg xxxx

Reason Code: damaged-----damaged equipment

Comment: Floor on Dock and tanker bay need work.

Status: Assigned

Status Date: 9/10/2012 11:10:20 AM

Assigned To: OLSON, BRIAN ROBERT

Notes: Dock and tanker bay cement are treated to be the barrier layer of containment, but we need to maintain the paint coating. Need crew to to come in and work on dock surface to completely strip and redo.
 7/20/12 Need to determine scope and cost. New GM begins 8/1/12.
 8/14/12 Kent Frame researching cost & labor.

Work Ticket #	Area	Reason	Notes	Assigned To	Status	Date	Modified By
75313		damaged-----damaged equipment	Dock and tanker bay cement are treated to be the barrier layer of containment, but we need to maintain the paint coating. Need crew to to come in and work on dock surface to completely strip and redo.	OLSON, BRIAN ROBERT	Assigned	5/17/2012 2:12:55 PM	KEYC1
75313		damaged-----damaged equipment	Dock and tanker bay cement are treated to be the barrier layer of containment, but we need to maintain the paint coating. Need crew to to come in and work on dock surface to completely strip and redo. 7/20/12 Need to determine scope and cost. New GM begins 8/1/12.	OLSON, BRIAN ROBERT	Assigned	7/20/2012 4:00:17 PM	OLSONB1
75313		damaged-----damaged equipment	Dock and tanker bay cement are treated to be the barrier layer of containment, but we need to maintain the paint coating. Need crew to to come in and work on dock surface to completely strip and redo. 7/20/12 Need to determine scope and cost. New GM begins 8/1/12. 8/14/12 Kent Frame researching cost & labor.	OLSON, BRIAN ROBERT	Assigned	8/14/2012 3:22:27 PM	FRAMEK1

Inspection Work Ticket

Work Ticket #: **75312**[Hide History](#)

Location: WH - Clean Harbors Kansas LLC - 2549 North New York Street

Area: Bldg xxxx

Reason Code: damaged-----damaged equipment

Comment: Coating issue in I bld

Status: Assigned

Status Date: 11/1/2012 9:32:14 AM

Assigned To: Frame, Kent W

Notes: The tornado rains dumped a tremendous amount of water in a short amount of time, some of which got into I building. Water is causing a couple bad of spots in the coating. The cement itself is treated to be the barrier layer, but we need to maintain the paint.
8/17/12 KENT FRAME Have begun researching past vendors for recoating and

Work Ticket #	Area	Reason	Notes	Assigned To	Status	Date	Modified By
75312		damaged-----damaged equipment	The tornado rains dumped a tremendous amount of water in a short amount of time, some of which got into I building. Water is causing a couple bad of spots in the coating. The cement itself is treated to be the barrier layer, but we need to maintain the paint.	Brown, Barry L	Assigned	5/17/2012 2:09:12 PM	KEYC1
75312		damaged-----damaged equipment	The tornado rains dumped a tremendous amount of water in a short amount of time, some of which got into I building. Water is causing a couple bad of spots in the coating. The cement itself is treated to be the barrier layer, but we need to maintain the paint. 8/17/12 KENT FRAME Have begun researching past vendors for recoating and coating repair.	Brown, Barry L	Assigned	8/17/2012 2:38:17 PM	FRAMEK1
75312		damaged-----damaged equipment	The tornado rains dumped a tremendous amount of water in a short amount of time, some of which got into I building. Water is causing a couple bad of spots in the coating. The cement itself is treated to be the barrier layer, but we need to maintain the paint. 8/17/12 KENT FRAME Have begun researching past vendors for recoating and coating repair. 9/10/12 KENT FRAME will be at WH this week to begin addressing coating concerns.	Brown, Barry L	Assigned	9/10/2012 11:09:31 AM	FRAMEK1